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13 Attorneys for Defendants
14 GENENTECH, INC. and
GENENTECH INC. GROUP LONG
15 TERM DISABILITY BENEFIT PLAN
16

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19

20 SUSAN BEERMAN,

21 Plaintiff,

22 v.

23 GENENTECH, INC.; GENENTECH INC.
24 GROUP LONG TERM DISABILITY
BENEFIT PLAN; and DOES 1 through 50,
25 inclusive,

26 Defendants.

CASE NO. C 06-00827 MMC

STIPULATION AND ~~PROPOSED~~ ORDER
EXTENDING TIME TO FILE CROSS-
MOTIONS ON THE MERITS

27 WHEREAS, at the case management conference in the above action on May 12, 2006,
the Court directed plaintiff Susan Beerman and defendants Genentech, Inc. and Genentech, Inc.
28 Group Long Term Disability Benefit Plan (collectively "the parties") to file opening briefs for

1 cross-motions on the merits by January 12, 2007;

2 WHEREAS the parties previously stipulated, and the Court previously ordered, that the
3 deadline for completing mediation would be extended to January 31, 2007;

4 WHEREAS the parties had difficulty identifying a mutually available date to participate
5 in the mediation due to press of business and vacation schedules, and have now set the mediation
6 to take place on the mutually-available date of January 23, 2007;

7 WHEREAS, in the interest of judicial economy and conserving the resources of the
8 parties and the Court, the parties wish to participate in the mediation before incurring the time
9 and expense of preparing and filing opening briefs for cross-motions on the merits;

10 NOW, THEREFORE, the parties hereby stipulate to and mutually request that the Court
11 grant an extension of the briefing schedule for cross-motions on the merits, so that the date by
12 which the parties are to file their opening briefs is extended to February 9, 2007.

13 Dated: December 20, 2006

TEAL & MONTGOMERY

14
15 /s/ Michael S. Henderson

16 Michael S. Henderson
17 Attorneys for Plaintiff, Susan Beerman

18 Dated: December 20, 2006

SEDGWICK DETERT MORAN & ARNOLD, LLP

19
20 /s/ Michael N. Westheimer

21 Rebecca A. Hull
22 Michael N. Westheimer
23 Tara L. Riedley
24 Attorneys for Defendants, Genentech, Inc., and
25 Genentech, Inc. Group Long Term Disability
26 Benefit Plan

27 IT IS SO ORDERED.

28 DATED: December 20, 2006



Hon. Maxine M. Chesney
United States District Judge